

**REMARKS/ARGUMENTS**

Claims 1, 5-10, 17, 22, 42, 50-52, and 55-59 are currently pending. Claims 1, 5-10, 17, 22, 42, 50-52, 55 and 57 are amended and claims 61, 92, 107-108, 110, and 113-114 are cancelled.

The abstract of the invention is objected to because of minor informalities. In view of the amendment to the abstract, it is respectfully requested that the above objection be withdrawn.

The specification is also amended to correct typographical errors. No new matter is added.

The Examiner has not acknowledged the IDS that was filed September 13, 2006. Applicants respectfully request acknowledgment of the above-mentioned IDS by initialing and returning the attached copy of the same IDS.

Claims 5, 9, 10, and 17 are rejected under 35 U.S.C. 112, second paragraph, as indefinite for failing to particularly point out and distinctly claim the subject matter which applicant regards as the invention. In view of the amendment to the above claims, it is respectfully requested that the above rejections be withdrawn.

Claims 1, 6-10, 17, 22, 42, 50-52, 55-59, 61, 92, 107, 108, 110, 113, and 114 are rejected under 35 U.S.C. 102(e) as being anticipated by Lewis et al. (US 6,233,565). Applicant respectfully submits that all of the pending claims are patentable over the cited references.

Independent claim 1 includes, among other limitations, "a plurality of cryptographic modules, each of the plurality of cryptographic modules for authenticating, processing value for the VBI, and generating indicia data for the plurality of users, wherein before each of the authentication, processing value, and generating indicia data for a given user is performed, an available cryptographic module retrieves the data record for the given user directly from the database." Lewis does not disclose the above limitation.

Rather, in the system of Lewis "each client 2n has a cryptographic module 12n and the RSP server 4 has a cryptographic module 14. The server cryptographic module 14 serves three functions: (1) authentication, (2) encryption, and (3) authorization. Authentication is the only function that requires interaction with a client cryptographic module 12." (Col. 21, lines 12-17,

underlining is added.). Furthermore, the "main function of the client cryptographic module 12 is to protect the [respective]customer's private key from both intrusion and corruption. The customer's private key is used to authenticate the client 2 to the server 4." (Col. 22, lines 6-8, emphasis is added.). Therefore, Lewis has one (central) server cryptographic module 14, and many client cryptographic modules 12, one for each client and dedicated to that client.

Consequently, "each of" the client cryptographic modules 12 is not capable of authenticating, processing value for the VBI, and generating indicia data for the plurality of users," rather, at least some these are the functions of the only (one central) server cryptographic module 14. Additionally, Lewis's system does not disclose "an available cryptographic module retrieves the data record for the given user directly from the database," because, as explained above, Lewis's system has one client cryptographic modules 12 for each client and dedicated to that client. Therefore, a client cryptographic module 12j cannot "retrieve the data record" for a user-k, even though the client cryptographic module 12j would be available.

Furthermore, Lewis makes it clear that "all sensitive data is stored in a Secure SQL Server Database and protected by SQL Integrated NT security. See FIG. 3. The Secure SQL Server database 305 is considered a part of the server cryptographic 14 module and may only be accessed by the cryptographic module [14]." (Col. 25, lines 55-59, emphasis is added.). Therefore, the client cryptographic modules 12 cannot "retrieve the data record for the given user directly from the database."

As a result, claim 1 is not anticipated by Lewis.

Independent claim 50 includes, among other limitations, "directly retrieving the data record for a given user from the database for authenticating the given user, processing value for the VBI and generating indicia data for the given user, by any available cryptographic module of the plurality of cryptographic modules." Likewise, Lewis does not teach the above limitation.

First, as explained above, the plurality of client cryptographic modules 12 of Lewis cannot authenticate the given user, process value for the VBI and generate indicia data for the given user rather, at least some these are the functions of the only (one central) server cryptographic module 14. Additionally, Lewis's system does not disclose "an available

**Appln No. 09/690,796**  
**Amdt date July 3, 2007**  
**Reply to Office action of April 4, 2007**


cryptographic module retrieves the data record for the given user directly from the database," because, as explained above, Lewis's system has one client cryptographic modules 12 for each client and dedicated to that client.

Second, client cryptographic modules 12 of Lewis cannot "retrieve the data record for the given user directly from the database," because "database 305 is considered a part of the server cryptographic 14 module and may only be accessed by the cryptographic module [14]." (Id.).

In short, independent claims 1, and 50 define a novel and unobvious invention over the cited references. Dependent claims 5-10m 17, 22, 42, 51, 52, and 55-59 are dependent from claims 1 and 50, respectively and therefore include all the limitations of their respective independent claims and additional limitations therein. Accordingly, these claims are also allowable over the cited references, as being dependent from allowable independent claims and for the additional limitations they include therein.

In view of the foregoing amendments and remarks, it is respectfully submitted that this application is now in condition for allowance, and accordingly, reconsideration and allowance are respectfully requested.

Respectfully submitted,  
CHRISTIE, PARKER & HALE, LLP

By   
Raymond R. Tabandeh  
Reg. No. 43,945  
626/795-9900

RRT/clv

CLV PAS744291.1-\*07/3/07 12:26 PM